

## EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

KENNETH CRAWFORD, #143333

Plaintiff,

v.

WASHINGTON et al

Defendants,

Case No.: 4:17-cv-11423

District Judge: Linda V. Parker

Magistrate Judge: Anthony P. Patti

KENNETH CRAWFORD, #143333  
Muskegon Correctional Facility  
2400 S. Sheridan  
Muskegon, MI 49442  
*Pro Se Plaintiff*

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**AFFIDAVIT OF CRAIG HUTCHINSON, M.D.**

STATE OF MICHIGAN            )  
  )ss  
COUNTY OF INGHAM         )

I, CRAIG HUTCHINSON, M.D., first being duly sworn on oath, state that if I were called to testify as a witness in this matter, I would testify to the following facts based upon my personal knowledge and review of Kenneth Crawford's Michigan Department of Corrections medical chart:

1. On all dates relevant to Plaintiff's Complaint, I was a physician licensed in the State of Michigan.
2. I am currently the Clinical Consultant in Infectious Disease for Quality Correctional Care of Michigan, PC, a subsidiary of Corizon Health, Inc.
3. Among my job duties in this position, I provide evaluation and treatment of prisoners of the Michigan Department of Corrections ("MDOC") who have the Hepatitis C virus ("HCV") infection. Accordingly, I am familiar with the HCV treatment protocol for inmates incarcerated within the MDOC.
4. As the Clinical Consultant in Infectious Disease for Quality Correctional Care, I work in conjunction with the MDOC with respect to the treatment of incarcerated individuals with HCV.
5. The HCV treatment program is implemented by the MDOC and follows the latest national treatment guidelines. The drugs required for the HCV treatment are paid for by the State of Michigan, not Corizon. Accordingly, the number of inmates who can receive treatment at any one time is controlled by the MDOC and is commensurate with the numbers of individuals requiring treatment under the standards of the program.
6. Under the MDOC program, inmates who have been identified as having HCV are monitored and prioritized for consideration for treatment. Those

inmates who need the treatment most immediately are provided access to treatment first.

7. On April 29, 2016, I saw Mr. Crawford for a telemedicine consultation regarding his Hepatitis C infection. I had been monitoring Mr. Crawford's condition for several years. Mr. Crawford had stage 4 fibrosis. On this date, I determined that Mr. Crawford was next in line for treatment based upon the severity of his disease and that I would start him on Harvoni treatment for Hepatitis C as soon as there was an open slot in the treatment program. I also explained that we would monitor his cirrhosis with a liver ultrasound every six months indefinitely, even if his Hepatitis C treatment successfully eliminated the infection.
8. Mr. Crawford's medical records reflect that he indeed began Harvoni treatment one month later on May 31, 2016 and finished treatment on August 22, 2016.
9. Mr. Crawford's medical records reflect that as of December 5, 2016 treatment successfully had cured his Hepatitis C infection. Follow-up testing in February 2017 confirmed the cure as well.
10. In addition, Mr. Crawford's liver ultrasound test results have continued to be normal.

11. Because Mr. Crawford no longer has HCV infection, I am no longer involved in his medical treatment. His health care providers at his institution are perfectly capable of scheduling him for regular testing and ultrasounds to monitor his cirrhosis and potential for liver cancer.

12. My involvement with Mr. Crawford's care as it relates to the allegations in his Complaint is limited to the issues set forth in this affidavit. The matters stated in this Affidavit are based on my personal knowledge and review of Michigan Department of Corrections medical records during the relevant time period.

13. I do not believe that I, in any way, acted with deliberate indifference in Mr. Crawford case, as I treated him in a manner that I, in my medical judgment, feel was appropriate.

Further affiant sayeth not.



CRAIG HUTCHINSON, M.D.

Subscribed and sworn to before me  
This 23 day of December, 2017.

